

REMARKS

In the Office Action,¹ the Examiner objected to the specification for informalities; objected to the drawings for misspellings; rejected claims 8 and 12 under 35 U.S.C. § 112, second paragraph, as being indefinite; rejected claims 1 and 3-17 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,865,608 to Hunter (*"Hunter"*).

By this Amendment, Applicants amend claims 1 and 7-17, and cancel claims 3-6. Claims 1 and 7-17 remain pending in this application.

Regarding the objection to the specification, Applicants have amended the specification to address the Examiner's concerns. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the objection to the specification.

Regarding the objection to the drawings, Applicants submit herewith two (2) drawing Replacement Sheets containing amended Figs. 3 and 4. Applicants have amended Figs. 3 and 4 to address the Examiner concerns. Furthermore, Applicants note that, contrary to the Examiner's allegation, Fig. 4, step S410 does not contain a misspelling. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the objection to the drawings.

Regarding the rejection of claims 8 and 12 under 35 U.S.C. § 112, second paragraph, Applicants have amended claims 8 and 12 to address the Examiner's

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement of characterization in the Office Action.

concerns. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 8 and 12 under 35 U.S.C. § 112, second paragraph.

The rejection of canceled claims 3-6 under 35 U.S.C. § 102(e) is moot.

Applicant's respectfully traverse the rejection of claims 1 and 7-17 under 35 U.S.C. § 102(e) as being anticipated by *Hunter*. In order to properly establish that *Hunter* anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully submit that *Hunter* fails to teach or suggest each and every element of Applicants' claimed invention.

Independent claim 9, as amended, calls for a combination including, for example, "determining whether the received internet connection request signal is a number domain connection request signal or a letter domain connection request signal." *Hunter* fails to disclose at least this claim element.

Hunter discloses, "[t]he linkage codes . . . are not limited to UPC codes . . . and the invention supports European EAN codes, ISBN codes for books, as well as custom linkage formats" (col. 5, lines 3-7), "the associated linkage code is merely 92801726. The all digit linkage code is shorter and easier to enter than the full URL" (col. 5, lines 60-62), "the linkage code is . . . equal to 051111128817 . . . and the completed URL would be <http://resolve.paperclick.com:8080/all/cmd?CMD=GET&TYPE=UPC&RID=05111&IID=12881&CODE=051111128817>" (col. 7, lines 57-62), and "the linkage code is

human-readable alphanumeric text string" (col. 11, lines 9-10). However, *Hunter* is silent with respect to "determining whether the received . . . signal is a number . . . signal or a letter . . . signal," as recited in claim 9 (emphasis added).

For at least the reasons given above, *Hunter* fails to anticipate independent claim 9. In addition, independent claims 1, 12, 13, and 15-17, although different in scope from claim 9, are allowable over *Hunter* for at least reasons similar to those given above for claim 9. Furthermore, dependent claims 7, 8, 10, 11, and 14 are allowable over *Hunter* at least by virtue of their dependence from allowable base claims 1, 9, and 13. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 1 and 3-17 under 35 U.S.C. § 102(e) as being anticipated by *Hunter*.

Moreover, Applicants note that the claimed invention uses access information that is very different from *Hunter*, as the means for accessing a website. For example, consistent with the claimed invention, the access information is expressed in very diverse structures, such as an English character URL, a Korean character URL, an IP address, or other access information with another structure.

In an embodiment consistent with the claimed invention, the "number domain" may be used as the access information. The "number domain" may comprise a plurality of numbers. The "number domain" may comprise the contents classification number, the first domain number, and the second domain number. Consistent with embodiments of the claimed invention, the first domain number may be a number corresponding to the highest domain number, for example, "co.kr", "net", "org", "com",

"ac.kr," etc. The second domain number may be a number corresponding to a name of a site, for example, "game", "chosun," etc.

For example, in an embodiment consistent with the claimed invention, if the number domain is 11142631, a converter may classify the 11142631 to 111,4263,1, wherein "111" may be the contents classification number corresponding to game-related contents, "4263" may be the second domain number corresponding to "game." The second domain number may be a number corresponding to the name of the site that the user requests to connect using, for example, a mobile terminal. The second domain number may be a number corresponding to a name of a site designated on a key pad of the mobile terminal.

Thus, the user may easily connect to a specific URL by inputting a "number domain" corresponding to the "letter domain," without an additional process, because the user can easily memorize the "number domain."

On the contrary, *Hunter* uses a linkage code as the access information. The linkage code may be, for example, a bar code symbol that is scanned with a bar code scanning device. The linkage code may also be a human-readable alphanumeric text string that may be typed in with a keypad connected to the client device. The linkage code includes two subcodes: a routing identification code (RID) and an item identification code (IID). In the embodiment wherein the linkage code is a UPC code, the RID can be the manufacturer's portion of the UPC, whereas the IID can be the item code portion of the UPC. The client passes the RID to a routing server to obtain a URL link to a resolution server for that code, and the client completes the URL link by filing in the IID. The client then passes the completed URL link to the resolution server to obtain

a target URL of a content associated with the IID on the content server associated with the RID. The RID corresponds to a specific URL template and is only used as the means for obtaining the URL template. See, e.g., *Hunter*, col. 7, lines 20-25. *Hunter* thus teaches the RID, and the IID comprise the number. However, *Hunter* never teaches the structure of RID or the structure of IID. Moreover, if the RID and IID are something like a barcode, it is difficult to memorize them. *Hunter* thus fails to disclose "a number structure of a number domain of the number domain connection request signal," as recited in claim 9, and similarly recited in claims 1, 12, 13, and 15-17. Claims 1, 9, 12, 13, and 15-17 are allowable over *Hunter* for at least this additional reason.

Conclusion

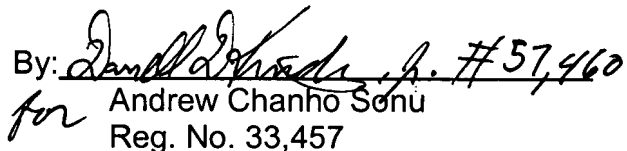
In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: August 8, 2007

By:  #57,460
for Andrew Chanho Sonu
Reg. No. 33,457

Attachments: Two (2) drawing Replacement Sheets (Figs. 3 and 4).